

The iTRS Advisory Council wishes to make a clarification regarding our December 4, 2018 *ex parte* comments. The 14-member iTRS Advisory Council is composed of stakeholders representing consumer groups, TRS Providers, iTRS Fund Contributors, State TRS administrators, and state regulatory representatives. With the exception of one contributor representative, the Council supports this filing.

On page 4 we stated **'The subcommittee notes that this \$1.58 price cap is below each Providers Cost Analysis '2019 Projected' that included a margin of 10% and did not allow any of the above-mentioned costs to be included.'** We now modify and correct the paragraph to read:

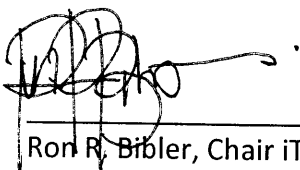
As previously noted, the subcommittee reviewed individual Provider Cost Analysis Charts provided by RolkaLoube that were completed with Provider data submitted in their annual cost filings. As the Commission is aware, a number of costs are not allowable in these cost filings including Consumer Premise Equipment and Installation, Research and Development (R&D) beyond meeting mandatory minimum standards, marketing, and income taxes. As the Commission is also aware, the Price Cap is scheduled to drop ten percent to \$1.58 in mid-2019. **The subcommittee notes, that pending resolution of whether or not CaptionCalls comment that their Intellectual Property (IP) costs should be included in any cost based analysis, we did observe the upcoming 2019 price cap reduction to \$1.58 is below each of the remaining Providers Cost Analysis 2019 Projected filing that included a margin of 10% and did not allow any of the above-mentioned costs to be included.** For that reason, the scheduled reduction is unrealistic and could cause Providers to 1) Exit the market and 2) Reduce the quality of service to mandatory minimum standards, which is not desirable and would not constitute the quality standards of the functional equivalence of a hearing persons call. We note that several Providers have expressed support, while not their ideal, of the interim \$1.75 Price Cap rate.

The iTRS Advisory Council recognizes the proposal filed on February 28, 2019 by several IP CTS providers asking the FCC to freeze the current IP CTS rate at \$1.75 per conversation minute and not move ahead with implementing another 10 percent rate cut to \$1.58 per conversation minute on July 1st, 2019.

The Council recognizes that on March 20, 2019, a coalition of consumer groups filed in support of the rate freeze proposal, and there is now widespread support and substantial evidence on the record as to why a freeze at \$1.75 is appropriate.

The Council also recognizes that on April 2, 2019, Hamilton Relay, Inc. filed comments in support of the \$1.75 interim rate freeze. In this filing, Hamilton commented: "...the Commission should permit the iTRS Advisory Council subcommittee to look into the various rate methodologies and expeditiously provide a recommendation." Hamilton also acknowledges "The subcommittee received the clearest independent understanding of actual provider costs, based on unprecedented access and dialogue with all the five current IP CTS providers."

Respectfully submitted,



Ron R. Bibler, Chair iTRS Advisory Council